

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

STATE OF TEXAS, *et al.*,

Plaintiffs,

v.

UNITED STATES OF AMERICA, *et al.*,

Defendants,

and

KARLA PEREZ, *et al.*,

Defendant-Intervenors.

Case No. 1:18-cv-00068

DECLARATION OF MARY FRANKLIN

Pursuant to 28 U.S.C. § 1746, I declare the following:

1. My name is Mary Franklin. I am over 18 years of age, of sound mind, capable of making this declaration, have personal knowledge of the facts stated in it, and can affirm that they are true and correct.

2. I am employed as the Director of County Operations for the Arkansas Departments of Human Services. I oversee the eligibility operations of various State-Federal social service programs, including Medicaid and the Child Health Insurance Program.

3. In order to administer and operate its Medicaid program, Arkansas runs three (3) parallel software systems. Two systems are used for eligibility determination, and a third separate system is used for claims processing. Without

doing a comprehensive case-by-case, file-by-file, claim-by-claim granular review of each individual in the two eligibility determination systems and the separate claims processing system, Arkansas is unable to identify the specific dollar amount of state Medicaid expenditures on individuals who were DACA recipients at the time they received their specific health services beyond what Arkansas has already provided in this case. The above described level of review is required because the apportionment of state and federal dollars for each claim depends on the specific program, category, date, and type of service received.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on this 27th day of October 2020.



Mary Franklin